

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

Squires Brothers, Inc.,

Plaintiff,

vs.

Cheminova, Inc. and Southern States
Cooperative, Inc.,

Defendants.

Case No.: 4:12-cv-03341-RBH

**PLAINTIFF'S ANSWERS TO RULE
26.01 INTERROGATORIES**

Plaintiff, in accordance with Rules 11 and 33 of the Federal Rules of Civil Procedure and Local Rule 26.01, hereby answers the Court's Interrogatories as follows:

INTERROGATORY A: State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None.

INTERROGATORY B: As to each claim, state whether it should be tried jury or non-jury and why.

RESPONSE: At this time, Plaintiff believes the claims in this action should be tried before a jury.

INTERROGATORY C: State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: **The Plaintiff is not a publicly owned company.**

INTERROGATORY D: State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

RESPONSE: **Plaintiff is not contesting removal of the action to this venue. Plaintiff's damages exceed \$75,000 therefore this Court has jurisdiction.**

INTERROGATORY E: Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal?

RESPONSE: **This matter is similar to Dwight Stevens, Toni Stevens and Blake Stevens v. Southern States Cooperative, Inc. 4:12-cv-03330-RBH, on issues of product failure.**

INTERROGATORY F: If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: **N/A**

INTERROGATORY G: (Defendants only.) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: **N/A**

Signature page follows.

ROGERS TOWNSEND & THOMAS, PC

  

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Date _____